

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WORCESTER DIVISION

12/27/05 P 10:03



SANDRA S. KATZ,
Plaintiff

v.

MATTHEW DENN, INSURANCE
COMMISSIONER OF THE STATE OF
DELAWARE, AS RECEIVER OF
NATIONAL HERITAGE LIFE INSURANCE
COMPANY IN LIQUIDATION,

Defendant and Third-Party Plaintiff,

v.

FEDERAL DEPOSIT INSURANCE
CORPORATION, UNITED STATES OF
AMERICA, E. PERRY KING, ALAN
MASON d/b/a ALAN MASON LEGAL
SERVICES, P.C. d/b/a ALAN MASON
LEGAL SERVICES, INC., ALAN MASON
LEGAL SERVICES, P.C., ALAN MASON
LEGAL SERVICES, INC., and ALAN
MASON LEGAL SERVICES, P.C. d/b/a
ALAN MASON LEGAL SERVICES, INC.,

Third-Party Defendants,

v.

E. PERRY KING and MANSOUR GAVAL,
Fourth-Party Defendants.

DOCKET NO. 05-CV-40014-FDS

PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

NOW COMES the plaintiff, Sandra S. Katz ("Katz"), and hereby moves this Court for summary judgment on the sole count of her Complaint as against the defendant, Matthew Denn, Insurance Commissioner of the State of Delaware, as receiver of the National Heritage Life Insurance Company in Liquidation ("Commissioner"), and for summary judgment on the sole

count of the Commissioner's counterclaim, such that the Court enters declaratory judgment in her favor holding that Katz took title to the subject property, 19 Canton Street, Worcester, Massachusetts, free and clear of any mortgage interest now claimed by the Commissioner. In support of her motion, Katz refers the Court to the Memorandum in Support of Motion for Summary Judgment filed herewith.

Respectfully submitted,

The Plaintiff,
SANDRA S. KATZ

By her attorneys,

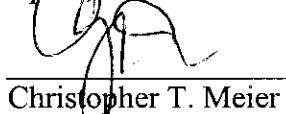


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Dated: December 17, 2005

CERTIFICATE OF SERVICE

I, Christopher T. Meier, hereby certify that I have this day served a copy of the foregoing document, by mailing a copy, first class mail, postage prepaid, to all counsel of record.



Christopher T. Meier

Dated: December 23, 2005